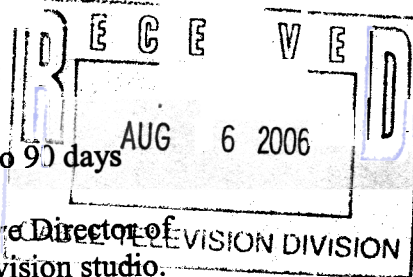


Cable Division Public Hearing on Proposal to Reduce Initial Licensing to 90 days



Director Matthews, my name is Curtis Henderson, and I am the Executive Director of Boston Neighborhood Network, New England's largest community television studio.

I am here on behalf of Boston Neighborhood Network and its Board of Directors to explain our strong opposition to the Cable Division's rulemaking proposal.

We respectfully and strenuously urge that the proposed 90 day licensing period for competitive initial licensing is woefully inadequate; as it would prevent any meaningful ascertainment of community cable needs, and it would not leave time for reasonable negotiations or license drafting

The proposed 90 day licensing period is inconsistent with the time honored tradition of having cable companies and community representatives meet and negotiate for a reasonable period prior to issuance of a license.

I have been directly involved in the cable community for more than 20 years. I have participated in licensing proceedings. I have closely observed numerous licensing proceedings in several communities. Good faith, diligent licensing proceedings have never been completed in 90 days and cannot be reasonably completed in 90 days.

Licensing proceedings should serve both the cable company and the public. To serve the public, adequate time must be allowed for regular meetings to discuss the complex details of community needs. Discussion of community needs must occur not only between the cable company and the municipality. Discussion of community needs must occur between the municipality and the access studio; and between the municipality and the schools, and between the municipality and the local government departments who seek reasonable cable technology facilities and services. Time must be allowed for public hearings, research and level playing field analysis. Extensive experience compels the conclusion that it is not even remotely possible to accomplish meaningful ascertainment of community access, school and local government community needs, and complete an entire licensing process, including drafting a complex license, in less than a year (on average). The Cable Division's own records provide abundant evidence of this.

The existing cable licensing framework stands as a model for balancing cable company and community needs. Cable companies are free to make programming and most technology decisions without local regulation as most programming and technology issues are already deregulated. However, cable companies are merely asked to spend a reasonable amount of time to meet with the communities they seek the privilege of serving, and discuss community television, educational access and governmental access needs, budgets, facilities, interconnection and the like. This provides for partnership and cooperation between cable companies and municipalities, and other interested parties. Other cable companies have thrived despite their involvement in community negotiations and licensing. This approach has been an essential part of Massachusetts cable licensing history. If the Cable Division reduces the licensing process to 90 days, it will destroy the

local licensing process and abandon a great tradition of companies and communities working together. We believe the state of Massachusetts would be better served by investing our time and energy in facilitating local licensing, not by undermining the process by reducing it to a 90 day period.

I thank you very much for consideration of our comments.

**Curtis Henderson, Jr.**  
General Manager

**Boston Neighborhood Network**  
8 Park Plaza  
Suite 2240  
Boston, MA 02116



Tel 617.720.2113 x12  
Fax 617.720.3781  
chenderson@bnntv.org  
[www.bnntv.org](http://www.bnntv.org)